

Bay Area Air Quality Management District

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**Permit Evaluation
and
Statement of Basis
for
RENEWAL of**

MAJOR FACILITY REVIEW PERMIT

**for
Ball Metal Beverage Container Corporation
Facility #A0148**

Facility Address:
2400 Huntington Dr.
Fairfield, CA 94533

Mailing Address:
9300 West 108th Circle
Broomfield, CO 80021

Application Engineer: Allan Chiu
Site Engineer: Eric Chan
Application: 8914

March 2006

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Title V Statement of Basis

A. Background

This facility is subject to the Operating Permit requirements of Title V of the federal Clean Air Act, Part 70 of Volume 40 of the Code of Federal Regulations (CFR), and BAAQMD Regulation 2, Rule 6, Major Facility Review because it is a major facility as defined by BAAQMD Regulation 2-6-212. It is a major facility because it has the "potential to emit," as defined by BAAQMD Regulation 2-6-218, of more than 100 tons per year of a regulated air pollutant.

Major Facility Operating permits (Title V permits) must meet specifications contained in 40 CFR Part 70 as contained in BAAQMD Regulation 2, Rule 6. The permits must contain all applicable requirements (as defined in BAAQMD Regulation 2-6-202), monitoring requirements, recordkeeping requirements, and reporting requirements. The permit holders must submit reports of all monitoring at least every six months and compliance certifications at least every year.

In the Bay Area, state and District requirements are also applicable requirements and are included in the permit. These requirements can be federally enforceable or non-federally enforceable. All applicable requirements are contained in Sections I through VI of the permit.

Each facility in the Bay Area is assigned a facility identifier that consists of a letter and a 4-digit number. This identifier is also considered to be the identifier for the permit. The identifier for this facility is A0148.

This facility received its initial Title V permit on July 28, 1999. This application is for a permit renewal. Although the current permit expired on July 1, 2004, it continues in force until the District takes final action on the permit renewal. The standard sections of the permit have changed since the permit was first issued. The proposed permit shows all changes to the permit in strikeout/underline format.

B. Facility Description

This facility produces 2-piece aluminum cans. The Draw and Iron (D & I) machines form and trim cans. The cans are conveyed from the D&I machines to can washers; then to the Deco area for basecoating and printing. Overvarnish is applied following printing. The cans are then conveyed to an applicator to apply a protective varnish to the bottom of the cans. Following varnishing, the cans are dried through a pin oven. Inside coatings are then sprayed on the interior cans and are cure with a bake oven. After final inspection, the cans are prepared for shipping.

This facility has three can lines consisting of coaters, curing ovens, and a Regenerative Thermal Oxidizer (RTO). Emissions from the curing ovens are vented to the RTO for abatement. Emissions consist of formaldehyde, glycol ethers, methanol, and xylene.

Since their last Title V application, the facility had added some miscellaneous sources that total to no more than 1 tons per year of POC emission increases to the facility. Some existing permitted sources were also removed from operation but there were no significant reduction in POC emissions (see section II Equipment for a detail listing of equipments). It is expected the

facility total POC emissions were essentially unchanged when compared to the previous application. The company reported total facility POC emissions in year ending 2003 to be 164 tons/year. District inventory for year ending 2003 shows 187 tons/year. The discrepancy lies in the assumptions and emission factors used in the calculation methodology.

C. Permit Content

The legal and factual basis for the permit follows. The permit sections are described in the order presented in the permit.

I. Standard Conditions

This section contains administrative requirements and conditions that apply to all facilities. If the Title IV (Acid Rain) requirements for certain fossil-fuel fired electrical generating facilities or the accidental release (40 CFR § 68) programs apply, the section will contain a standard condition pertaining to these programs. Many of these conditions derive from 40 CFR § 70.6, Permit Content, which dictates certain standard conditions that must be placed in the permit. The language that the District has developed for many of these requirements has been adopted into the BAAQMD Manual of Procedures, Volume II, Part 3, Section 4, and therefore must appear in the permit.

The standard conditions also contain references to BAAQMD Regulation 1 and Regulation 2. These are the District's General Provisions and Permitting rules.

Changes to permit:

There are no changes proposed for this section.

II. Equipment

This section of the permit lists all permitted or significant sources. Each source is identified by an S and a number (e.g., S24).

Permitted sources are those sources that require a BAAQMD operating permit pursuant to BAAQMD Rule 2-1-302.

Significant sources are those sources that have a potential to emit of more than 2 tons of a "regulated air pollutant," as defined in BAAQMD Rule 2-6-222, per year or 400 pounds of a "hazardous air pollutant," as defined in BAAQMD Rule 2-6-210, per year.

All abatement (control) devices that control permitted or significant sources are listed. Each abatement device whose primary function is to reduce emissions is identified by an A and a number (e.g., A-24).

The equipment section is considered to be part of the facility description. It contains information that is necessary for applicability determinations, such as fuel types, contents or sizes of tanks, etc. This information is part of the factual basis of the permit.

Each of the permitted sources has previously been issued a permit to operate pursuant to the requirements of BAAQMD Regulation 2, Permits. These permits are issued in accordance with

state law and the District's regulations. The capacities in the permitted sources table are the maximum allowable capacities for each source, pursuant to Standard Condition I.J and Regulation 2-1-403.

Following are explanations of the differences in the equipment list between the time that the facility originally applied for a Title V permit and the permit proposal date:

Changes to permit:

Devices permitted since the initial Title V permit was issued:

- S-63 Interior Coating Storage Tank T1 (application 3138)
- S-64 Interior Coating Storage Tank T2 (application 3138)
- S-65 Emergency Standby Generator #1, 0.7 MM Btu/hr (application 3138)
- S-66 Emergency Standby Generator #2, 0.9 MM Btu/hr (application 3138)
- S-67 Video Jet Excel Printer (application 2726)
- S-68 Ink Dot Printer (application 3101)
- S-69 Ink Dot Printer (application 8187)

Devices removed from service since the initial Title V permit was issued:

- S-25 Duo Flow Oven removed from service
- S-26 Base Coater #32 removed from service
- S-28 Bottom Coater removed from service
- S-32 Interior Coating Bulk Storage Tank removed from service
- S-33 Interior Coating Bulk Storage Tank removed from service
- S-34 Interior Coating Bulk Storage Tank removed from service
- S-54 Basecoater removed from service
- S-59 Bottom Coater removed from service

III. Generally Applicable Requirements

This section of the permit lists requirements that generally apply to all sources at a facility including insignificant sources and portable equipment that may not require a District permit. If a generally applicable requirement applies specifically to a source that is permitted or significant, the standard will also appear in Section IV and the monitoring for that requirement will appear in Sections IV and VII of the permit. Parts of this section apply to all facilities (e.g., particulate, architectural coating, odorous substance, and sandblasting standards). In addition, standards that apply to insignificant or unpermitted sources at a facility (e.g., refrigeration units that use more than 50 pounds of an ozone-depleting compound) are placed in this section.

Unpermitted sources are exempt from normal District permits pursuant to an exemption in BAAQMD Regulation 2, Rule 1. They may, however, be specifically described in a Title V permit if they are considered *significant sources* pursuant to the definition in BAAQMD Rule 2-6-239.

Changes to permit:

Section III will be modified to say that SIP standards are now found on EPA's website and are not included as part of the permit.

The note regarding SIP information from the Rule Development Section will be deleted since the SIP standards are now found on EPA's website.

IV. Source-Specific Applicable Requirements

This section of the permit lists the applicable requirements that apply to permitted or significant sources. These applicable requirements are contained in tables that pertain to one or more sources that have the same requirements. The order of the requirements is:

- District Rules
- SIP Rules (if any) are listed following the corresponding District rules. SIP rules are District rules that have been approved by EPA for inclusion in the California State Implementation Plan. SIP rules are “federally enforceable” and a “Y” (yes) indication will appear in the “Federally Enforceable” column. If the SIP rule is the current District rule, separate citation of the SIP rule is not necessary and the “Federally Enforceable” column will have a “Y” for “yes”. If the SIP rule is not the current District rule, the SIP rule or the necessary portion of the SIP rule is cited separately after the District rule. The SIP portion will be federally enforceable; the non-SIP version will not be federally enforceable, unless EPA has approved it through another program.
- Other District requirements, such as the Manual of Procedures, as appropriate.
- Federal requirements (other than SIP provisions)
- BAAQMD permit conditions. The text of BAAQMD permit conditions is found in Section VI of the permit.
- Federal permit conditions. The text of Federal permit conditions, if any, is found in Section VI of the permit.

Section IV of the permit contains citations to all of the applicable requirements. The text of the requirements is found in the regulations, which are readily available on the District's or EPA's websites, or in the permit conditions, which are found in Section VI of the permit. All monitoring requirements are cited in Section IV. Section VII is a cross-reference between the limits and monitoring requirements. A discussion of monitoring is included in Section C.VII of this permit evaluation/statement of basis.

Complex Applicability Determination:

40 CFR Part 63 contains the NESHAP standards for Surface Coating of Metal Cans. This NESHAP was evaluated to determine if Ball Metal Corporation was subject to the MACT emission control requirements. The NESHAP requires MACT controls for metal can surface coating operations which are major sources of HAPs which are defined thusly: *...any stationary source or group of stationary sources located within a contiguous area and under common control that emits or has the potential to emit considering controls, in the aggregate 10 tons per year (tpy) or more of any HAP or 25 tpy or more of any combination of HAPs.* The majority of HAPS emissions from this facility are ethylene glycol monobutyl ether (EGBE). On November 18, 2004, the Environmental Protection Agency (EPA) signed the chemical delisting rule for ethylene glycol butyl ether (EGBE) from the Clean Air Act list of Hazardous Air Pollutants. (See <http://www.epa.gov/airlinks/airlinks1.html>).

Effective upon publication in the Federal Register, EGBE will no longer be subject to the Maximum Achievable Control Technology (MACT) and other requirements. Like most solvents, EGBE continues to be regulated as a volatile organic compound (VOC). EGBE is a versatile chemical that has been used in a variety of formulations, including can coatings, for more than 50 years. Based upon an extensive review of ambient EGBE levels and associated health and environmental impacts, EPA concluded that exposure from industrial sources may not reasonably be anticipated to cause human health or environmental problems. As a result, removal of EGBE as a regulated HAP will have a significant impact on the number of can plants ultimately subject to the final Metal Can MACT air toxics rule. There is a current proposal to remove the 2-piece can subcategory from NESHAP 40 CFR Part 63.

Ball Metal Corporation had submitted a Synthetic Minor Application # 11407 to accept facility wide HAPs limit of 9 TPY (single HAPs) and 23 TPY (combine HAPs). The application was approved by the District. Therefore, the facility is exempt from District MACT requirements per Regulation 2-2-114.

Regulation 10 incorporates the federal NSPS (40 CFR 60 subpart WW) by reference. This facility has not been modified since the previous Title V permit was issued. Therefore, the NSPS will not be applicable.

Compliance Assurance Monitoring: The applicability of compliance assurance monitoring (CAM) must be considered at this facility because the facility uses an emission control device to achieve compliance with a federally enforceable emission limit. The control device in use is a RTO (regenerative thermal oxidizer, identified as source A-5). The RTO controls VOC emissions from their coating ovens that are subject to the requirements of Regulation 8, Rule 11-302 (90% minimum abatement efficiency of VOC).

To comply with 40 CFR 64.3, the following CAM plan was proposed and added to District condition #9904:

1. The RTO operates at or above 1,400 degrees F.
2. Oven dampers are closed (emissions directed to the RTO) while cans are being printed and coated.
3. The RTO is to maintain at least a 1.5 inches of water vacuum at the inlet manifold box.
4. Record Keeping: Twenty-second readings are averaged and recorded every 15 minutes.

Monitoring the combustion chamber temperature assures that the destruction efficiency demonstrated during the source test is maintained at all times.

Monitoring the damper positions assures that gas flow is directed to the RTO.

Monitoring the RTO inlet duct pressure assures that capture efficiency, at sources with gas flow directed to the RTO, is maintained at the same level demonstrated during source testing.

Damper position (either open to the the RTO or closed to the RTO) and duct pressure monitoring will be performed by visually inspecting the damper position of each source connected to the RTO and recording the inlet pressure from a magnahelic gauge on a monthly basis.

Combustion chamber temperature will be recorded on a continuous paper chart or electronically at least once every 15 minutes.

V. Schedule of Compliance

A schedule of compliance is required in all Title V permits pursuant to BAAQMD Regulation 2-6-409.10 which provides that a major facility review permit shall contain the following information and provisions:

“409.10 A schedule of compliance containing the following elements:

- 10.1 A statement that the facility shall continue to comply with all applicable requirements with which it is currently in compliance;
- 10.2 A statement that the facility shall meet all applicable requirements on a timely basis as requirements become effective during the permit term; and
- 10.3 If the facility is out of compliance with an applicable requirement at the time of issuance, revision, or reopening, the schedule of compliance shall contain a plan by which the facility will achieve compliance. The plan shall contain deadlines for each item in the plan. The schedule of compliance shall also contain a requirement for submission of progress reports by the facility at least every six months. The progress reports shall contain the dates by which each item in the plan was achieved and an explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.”

The District conducts annual source test of this facility as part of their Enforcement Policy and Procedures.

Since the District has not determined that the facility is out of compliance with an applicable requirement, the schedule of compliance for this permit contains only sections 2-6-409.10.1 and 2-6-409.10.2.

The BAAQMD Compliance and Enforcement Division have conducted a review of compliance over the past year and have no records of compliance problems at this facility during the past year. The compliance report is contained in Appendix A of this permit evaluation and statement of basis.

VI. Permit Conditions

During the Title V permit development, the District has reviewed the existing permit conditions, deleted the obsolete conditions, and, as appropriate, revised the conditions for clarity and enforceability. Each permit condition is identified with a unique numerical identifier, up to five digits.

When necessary to meet Title V requirements, additional monitoring, recordkeeping, or reporting has been added to the permit.

All changes to existing permit conditions are clearly shown in “strike-out/underline” format in the proposed permit. When the permit is issued, all “strike-out” language will be deleted; all “underline” language will be retained, subject to consideration of comments received.

The existing permit conditions are derived from previously issued District Authorities to Construct (A/C) or Permits to Operate (P/O). Permit conditions may also be imposed or revised as part of the annual review of the facility by the District pursuant to California Health and

Safety Code (H&SC) § 42301(e), through a variance pursuant to H&SC § 42350 *et seq.*, an order of abatement pursuant to H&SC § 42450 *et seq.*, or as an administrative revision initiated by District staff. After issuance of the Title V permit, permit conditions will be revised using the procedures in Regulation 2, Rule 6, Major Facility Review.

Conditions that are obsolete or that have no regulatory basis will be deleted from the permit.

Conditions will be deleted from the permit due to the following reasons, when applicable:

- Redundancy in record-keeping requirements.
- Redundancy in other conditions, regulations and rules.
- The condition has been superseded by other regulations and rules.
- The equipment has been taken out of service or is exempt.
- The event has already occurred (i.e. initial or start-up source tests).

The regulatory basis is listed following each condition. The regulatory basis may be a rule or a regulation. The District is also using the following terms for regulatory basis:

- **BACT:** This term is used for a condition imposed by the Air Pollution Control Officer (APCO) to ensure compliance with the Best Available Control Technology in Regulation 2-2-301.
- **Cumulative Increase:** This term is used for a condition imposed by the APCO, which limits a source's operation to the operation described in the permit application pursuant to BAAQMD Regulation 2-1-403.
- **Offsets:** This term is used for a condition imposed by the APCO to ensure compliance with the use of offsets for the permitting of a source or with the banking of emissions from a source pursuant to Regulation 2, Rules 2 and 4.
- **PSD:** This term is used for a condition imposed by the APCO to ensure compliance with a Prevention of Significant Deterioration permit issued pursuant to Regulation 2, Rule 2.
- **TRMP:** This term is used for a condition imposed by the APCO to ensure compliance with limits that arise from the District's Toxic Risk Management Policy.

Additional monitoring will be added, where appropriate, to assure compliance with 40 CFR 64. (See condition #9904 parts 1, 1a, 2, and 3)

Changes to permit:

The following permit conditions that apply to sources permitted after the original Title V permit was issued will be added to the permit:

COND# #18728

S-63 Interior Coating Storage Tank T1

S-64 Interior Coating Storage Tank T2

Condition #18729

S-65 Emergency Standby Generator #1, 0.7 MM Btu/hr

S-66 Emergency Standby Generator #2, 0.9 MM Btu/hr

Condition #18644

S-67 Video Jet Excel Printer

Condition #18645

S-68 Ink Dot Printer

Condition #20955

S-69 Ink Dot Printer

Condition # 21993

Facility-wide HAPs limit of no more than 9 TPY of a single HAPs and 23 TPY combine HAPs. This condition was added to exempt the facility from MACT standards (District Regulation 2-2-114)

Condition #9904

Facility Wide Permit Condition

1. A minimum combustion chamber temperature of 1400 degrees Fahrenheit and an inlet manifold pressure to A-5 of greater than or equal to the absolute value of -1.5 inches of water shall be maintained at A-5 Regenerative Thermal Oxidizer whenever POC emissions are being abated. This minimum temperature and inlet pressure may be changed to reflect source test results upon written approval of the APCO. The location and type of the thermocouples used to monitor the combustion chamber temperature shall be subject to the review and approval of the District Source Test Section. (Basis: cumulative increase, 40 CFR 64)
 - a. The damper positions of Line 1 (S4, S6, and printer S12), Line 2 (S5, S7, S53, S51, S13), and Line 3 (S56, S58, S60) shall be in the close position (directed to oxidizer) at all times during normal operations except in case of malfunction and maintenance activities. (Basis: 40 CFR 64)

The temperature, inlet pressure requirement, and closed damper position will be added to the permit to meet compliance assurance monitoring of the RTO to ensure the thermal oxidizer would operate with at least 95% destruction efficiency.

The following recordkeeping requirement for compliance assurance monitoring will be added to the permit.

2. The combustion chamber temperature, damper position of ovens, and the inlet pressure of the A-5 RTO shall be monitored and recorded on a continuous basis or twenty second readings shall be averaged and recorded every 15 minutes. (Basis: cumulative increase, 40 CFR 64))

VII. Applicable Limits and Compliance Monitoring Requirements

This section of the permit is a summary of numerical limits and related monitoring requirements for each source. The summary includes a citation for each monitoring requirement, frequency of monitoring, and type of monitoring. The applicable requirements for monitoring are completely contained in Sections IV, Source-Specific Applicable Requirements, and VI, Permit Conditions, of the permit.

The District has reviewed all monitoring and has determined the existing monitoring is adequate with the following exceptions.

The tables below contain only the limits for which there is no monitoring or inadequate monitoring in the applicable requirements. The District has examined the monitoring for other

limits and has determined that monitoring is adequate to provide a reasonable assurance of compliance. Calculations for potential to emit will be provided in the discussion when no monitoring is proposed due to the size of a source.

Monitoring decisions are typically the result of a balancing of several different factors including: 1) the likelihood of a violation given the characteristics of normal operation, 2) degree of variability in the operation and in the control device, if there is one, 3) the potential severity of impact of an undetected violation, 4) the technical feasibility and probative value of indicator monitoring, 5) the economic feasibility of indicator monitoring, and 6) whether there is some other factor, such as a different regulatory restriction applicable to the same operation, that also provides some assurance of compliance with the limit in question.

These factors are the same as those historically applied by the District in developing monitoring for applicable requirements. It follows that, although Title V calls for a re-examination of all monitoring, there is a presumption that these factors have been appropriately balanced and incorporated in the District's prior rule development and/or permit issuance. It is possible that, where a rule or permit requirement has historically had no monitoring associated with it, no monitoring may still be appropriate in the Title V permit if, for instance, there is little likelihood of a violation. Compliance behavior and associated costs of compliance are determined in part by the frequency and nature of associated monitoring requirements. As a result, the District will generally revise the nature or frequency of monitoring only when it can support a conclusion that existing monitoring is inadequate.

SO₂ Sources

S# & Description	Emission Limit Citation	Federally Enforceable Emission Limit	Monitoring
S-65, S-66 Emergency Standby Generators, Natural Gas Fired	BAAQMD 9-1-301	Ground level concentrations of SO ₂ shall not exceed: 0.5 ppm for 3 consecutive minutes AND 0.25 ppm averaged over 60 consecutive minutes AND 0.05 ppm averaged over 24 hours	N/A
	BAAQMD 9-1-302	300 ppm (dry)	N/A

SO₂ Discussion:

BAAQMD Regulation 9-1-301

Area monitoring to demonstrate compliance with the ground level SO₂ concentration requirements of Regulation 9-1-301 is at the discretion of the APCO (per BAAQMD Regulation 9-1-501). This facility does not have equipment that emits large amounts of SO₂ (0.05 tpy) and therefore is not required to have ground level monitoring by the APCO.

All facility combustion sources are subject to the SO₂ emission limitations in District Regulation 9, Rule 1 (ground-level concentration and emission point concentration). In EPA's June 24, 1999 agreement with CAPCOA and ARB, "Periodic Monitoring Recommendations for Generally Applicable Requirements in SIP", EPA has agreed that natural-gas-fired combustion sources do not need additional monitoring to verify compliance with Regulation 9, Rule 1, since violations of the regulation are unlikely. Therefore, no monitoring is necessary for this requirement.

PM Sources

S# & Description	Emission Limit Citation	Federally Enforceable Emission Limit	Monitoring
S-65, S-66 Emergency Standby Generators, Natural Gas Fired	BAAQMD Regulation 6-301	Ringelmann 1.0	None
	BAAQMD Regulation 6-310	0.15 gr/dscf	None

PM Discussion:

BAAQMD Regulation 6 “Particulate Matter and Visible Emissions”

Visible Emissions

BAAQMD Regulation 6-301 limits visible emissions to no darker than 1.0 on the Ringelmann Chart (except for periods or aggregate periods less than 3 minutes in any hour). Visible emissions are normally not associated with combustion of gaseous fuels, such as natural gas. Source S-65 and source S-66 burns natural gas exclusively, therefore, per the EPA's June 24, 1999 agreement with CAPCOA and ARB titled "Summary of Periodic Monitoring Recommendations for Generally Applicable Requirements in SIP", no monitoring is required to assure compliance with this limit for these sources.

S-65 and S-66 only burn gaseous fuels. They are expected to operate in compliance with Regulation 6-301 and Regulation 6-310. Monitoring is therefore not required.

POC Discussion:

BAAQMD Regulation 8-11-302

POC emissions occur mainly through the coating lines' curing ovens. The emissions are vented to a RTO with 95% abatement efficiency. This meets the District Regulation 8, Rule 11, Section 302 requirement (requires abatement with 90% control efficiency). Also, the combustion chamber temperature, inlet pressure, and the damper positions must be monitored to ensure the

RTO will be functioning at destruction efficiency consistent to source test results (see Compliance Assurance Monitoring for a detailed discussion).

VIII. Test Methods

This section of the permit lists test methods that are associated with standards in District or other rules. It is included only for reference. In most cases, the test methods in the rules are source test methods that can be used to determine compliance but are not required on an ongoing basis. They are not applicable requirements.

If a rule or permit condition requires ongoing testing, the requirement will also appear in Section IV of the permit.

Changes to permit:

No changes are proposed for this section.

IX. Permit Shield:

The District rules allow two types of permit shields. The permit shield types are defined as follows: (1) A provision in a major facility review permit explaining that specific federally enforceable regulations and standards do not apply to a source or group of sources, or (2) A provision in a major facility review permit explaining that specific federally enforceable applicable requirements for monitoring, recordkeeping and/or reporting are subsumed because other applicable requirements for monitoring, recordkeeping, and reporting in the permit will assure compliance with all emission limits.

The second type of permit shield is allowed by EPA's White Paper 2 for Improved Implementation of the Part 70 Operating Permits Program. The District uses the second type of permit shield for all streamlining of monitoring, recordkeeping, and reporting requirements in Title V permits. The District's program does not allow other types of streamlining in Title V permits.

This facility has the second type of permit shield.

The following is the detail of the permit shields that were requested by the applicant.

Permit Shield for Non-applicable Requirements

S-4 DECORATION OVEN, LINE 1

S-5 BASECOAT OVEN, LINE 2

S-6 INTERIOR COATING OVEN, LINE 1

S-7 INTERIOR COATING OVEN, LINE 2

S-12 PRINTER WITH OVERVARNISHER, LINE 1

S-13 PRINTER WITH OVERVARNISHER, LINE 2

S-16 INTERIOR COATING SPRAY BANK, LINE 1

S-17 INTERIOR COATING SPRAY BANK, LINE 2

S-24 INTERIOR COATING SPRAY BANK, LINE 3

S-27 PRINTER #37 WITH OVERVARNISHER, LINE 3

Citation	Title or Description (Reason not applicable)
40 CFR 60	Standards of Performance for New Stationary Sources (12/31/71) (Sources not modified since November 26, 1980)
Subpart A	General Provisions
Subpart WW	Standards of Performance for the Beverage Can Surface Coating Industry (8/25/83)

X. Alternate Operating Scenarios:

No alternate operating scenario has been requested for this facility.

XI. Compliance Status:

An office memorandum from the Director of Compliance and Enforcement to the Director of Permit Services dated January 10, 2006 presents a review of the compliance record of Ball Metal Beverage Container Corporation (Site #A0148). The Compliance and Enforcement Division staff has reviewed the records for the period of December 31, 2004 through December 31, 2005. This review was initiated as part of the District evaluation of an application by Ball Metal Beverage Container for a renewal Title V permit. During the period subject to review, activities known to the District include:

- There were no Notices of Violation issued during this review period.
- The District did not receive any alleged complaints.
- The facility is not operating under a Variance or an Order of Abatement from the District Board.
- There were no monitor excesses or equipment breakdowns reported or documented by District staff.

The owner certified that all equipment was operating in compliance on January 21, 2004. No non-compliance issues have been identified to date.

XII. Differences between the Application and the Proposed Permit:

The Title V renewal permit application was originally submitted on January 21, 2004. This version is the basis for constructing the proposed Title V permit. Revisions were made to the application as a result of changes at the facility that were made pursuant to Permit Application #8914. Changes to the permit *conditions, application, sources, etc.* include the following:

The following are new sources added to the facility and their associated permit conditions:

- S-63 Interior Coating Storage Tank T1 with Condition # 18728
- S-64 Interior Coating Storage Tank T2 with Condition # 18728
- S-65 Emergency Standby Generator #1, 0.7MM Btu/hr with Condition # 18729
- S-66 Emergency Standby Generator #2, 0.9MM Btu/hr with Condition # 18729
- S-67 Video Jet Excel Printer with Condition # 18644
- S-68 Ink Dot Printer with Condition # 18645
- S-69 Ink Dot Printer with Condition # 20955

The following sources were removed from the facility:

- S-25 Duo Flow Oven removed from service
- S-26 Base Coater #32 removed from service
- S-28 Bottom Coater removed from service
- S-32 Interior Coating Bulk Storage Tank removed from service
- S-33 Interior Coating Bulk Storage Tank removed from service
- S-34 Interior Coating Bulk Storage Tank removed from service
- S-54 Basecoater removed from service
- S-59 Bottom Coater removed from service

Permit Condition # 21993 was added under District application #11407 that required facility wide HAPs limitation of no more than 9 TPY of a single HAP and 23 TPY of combine HAPs.

Changes were made to Condition #9904 to include monitoring of the inlet pressure to the RTO and the closure of oven dampers at all times during normal operations.

APPENDIX A
BAAQMD COMPLIANCE REPORT

COMPLIANCE AND ENFORCEMENT DIVISION

OFFICE MEMORANDUM

January 10, 2006

TO: BRIAN BATEMAN, DIRECTOR, ENGINEERING DIVISION

FROM: KELLY WEE, DIRECTOR OF ENFORCEMENT 

SUBJECT: REVIEW OF COMPLIANCE RECORD OF:

Ball Metal Beverage Container Corporation Site # A0148

Background

This review was initiated as part of the District evaluation of an application by Ball Metal Beverage Container Corporation for a Title V Permit renewal. It is standard practice of the Compliance and Enforcement Division to undertake a compliance record review in advance of a renewal of a Title V Permit to Operate. The purpose of this review is to assure that any non-compliance problems identified during the prior term or twelve months have been adequately addressed, or, if non-compliance persists, that a schedule of compliance is properly incorporated into the Title V permit. Additionally, the review checks for patterns of recurring violation that may be addressed by additional permit terms. Finally, the review is intended to recommend, if necessary, any additional permit conditions and limitations to improve compliance.

Finding

The Enforcement Division staff has commenced a review of the records for Ball Metal Beverage Container Corporation for the period of December 31, 2004 to December 31, 2005. During this review period Ball Metal Beverage Container Corporation activities known to the District include:

The District received one reportable compliance event; however, the event was found not to be in violation.

The District did not issue any Notices of Violation.

The District did not receive any air pollution complaints alleging Ball Metal Beverage Container Corporation as the source.

Staff reviewed Ball Metal Beverage Container Corporation Annual Compliance Certifications for December 31, 2000 through December 31, 2005 and found no on-going non-compliance and no recurring patterns of violations.

There are no enforcement agreements, open variances, or open abatement orders for Ball Metal Beverage Container Corporation.

Conclusion

The Compliance and Enforcement Division has made a determination that for the period of December 31, 2004 to December 31, 2005 Ball Metal Beverage Container Corporation was in continuous compliance. There is no evidence of on-going non-compliance and no recurring pattern of violations that would warrant consideration of a Title V permit compliance schedule.

APPENDIX B
GLOSSARY

ACT

Federal Clean Air Act

APCO

Air Pollution Control Officer

ARB

Air Resources Board

BAAQMD

Bay Area Air Quality Management District

BACT

Best Available Control Technology

Basis

The underlying authority, which allows the District to impose requirements.

CAA

The federal Clean Air Act

CAAQS

California Ambient Air Quality Standards

CAPCOA

California Air Pollution Control Officers Association

CEQA

California Environmental Quality Act

CFR

The Code of Federal Regulations. 40 CFR contains the implementing regulations for federal environmental statutes such as the Clean Air Act. Parts 50-99 of 40 CFR contain the requirements for air pollution programs.

CO

Carbon Monoxide

Cumulative Increase

The sum of permitted emissions from each new or modified source since a specified date pursuant to BAAQMD Rule 2-1-403, Permit Conditions (as amended by the District Board on 7/17/91) and SIP Rule 2-1-403, Permit Conditions (as approved by EPA on 6/23/95). Cumulative increase is used to determine whether threshold-based requirements are triggered.

District

The Bay Area Air Quality Management District

dscf

Dry Standard Cubic Feet

EPA

The federal Environmental Protection Agency.

Excluded

Not subject to any District regulations.

Federally Enforceable, FE

All limitations and conditions which are enforceable by the Administrator of the EPA including those requirements developed pursuant to 40 CFR Part 51, subpart I (NSR), Part 52.21 (PSD), Part 60 (NSPS), Part 61 (NESHAPs), Part 63 (MACT), and Part 72 (Permits Regulation, Acid Rain), including limitations and conditions contained in operating permits issued under an EPA-approved program that has been incorporated into the SIP.

FP

Filterable Particulate as measured by BAAQMD Method ST-15, Particulate.

HAP

Hazardous Air Pollutant. Any pollutant listed pursuant to Section 112(b) of the Act. Also refers to the program mandated by Title I, Section 112, of the Act and implemented by 40 CFR Part 63.

Major Facility

A facility with potential emissions of: (1) at least 100 tons per year of regulated air pollutants, (2) at least 10 tons per year of any single hazardous air pollutant, and/or (3) at least 25 tons per year of any combination of hazardous air pollutants, or such lesser quantity of hazardous air pollutants as determined by the EPA administrator.

MFR

Major Facility Review. The District's term for the federal operating permit program mandated by Title V of the Federal Clean Air Act and implemented by District Regulation 2, Rule 6.

MOP

The District's Manual of Procedures.

NAAQS

National Ambient Air Quality Standards

NESHAPS

National Emission Standards for Hazardous Air Pollutants. See in 40 CFR Parts 61 and 63.

NMHC

Non-methane Hydrocarbons (Same as NMOC)

NMOC

Non-methane Organic Compounds (Same as NMHC)

NO_x

Oxides of nitrogen.

NSPS

Standards of Performance for New Stationary Sources. Federal standards for emissions from new stationary sources. Mandated by Title I, Section 111 of the Federal Clean Air Act, and implemented by 40 CFR Part 60 and District Regulation 10.

NSR

New Source Review. A federal program for pre-construction review and permitting of new and modified sources of pollutants for which criteria have been established in accordance with Section 108 of the Federal Clean Air Act. Mandated by Title I of the Federal Clean Air Act and implemented by 40 CFR Parts 51 and 52 and District Regulation 2, Rule 2. (Note: There are additional NSR requirements mandated by the California Clean Air Act.)

Offset Requirement

A New Source Review requirement to provide federally enforceable emission offsets for the emissions from a new or modified source. Applies to emissions of POC, NOx, PM10, and SO2.

Phase II Acid Rain Facility

A facility that generates electricity for sale through fossil-fuel combustion and is not exempted by 40 CFR 72 from Titles IV and V of the Clean Air Act.

POC

Precursor Organic Compounds

PM

Particulate Matter

PM10

Particulate matter with aerodynamic equivalent diameter of less than or equal to 10 microns

PSD

Prevention of Significant Deterioration. A federal program for permitting new and modified sources of those air pollutants for which the District is classified "attainment" of the National Air Ambient Quality Standards. Mandated by Title I of the Act and implemented by both 40 CFR Part 52 and District Regulation 2, Rule 2.

SIP

State Implementation Plan. State and District programs and regulations approved by EPA and developed in order to attain the National Air Ambient Quality Standards. Mandated by Title I of the Act.

SO2

Sulfur dioxide

THC

Total Hydrocarbons (NMHC + Methane)

Title V

Title V of the federal Clean Air Act. Requires a federally enforceable operating permit program for major and certain other facilities.

TOC

Total Organic Compounds (NMOC + Methane, Same as THC)

TPH

Total Petroleum Hydrocarbons

TRMP

Toxic Risk Management Plan

TSP

Total Suspended Particulate

VOC

Volatile Organic Compounds

Units of Measure:

bhp	=	brake-horsepower
Btu	=	British thermal unit
cfm	=	cubic feet per minute
g	=	grams
gal	=	gallon
gpm	=	gallons per minute
hp	=	horsepower
hr	=	hour
lb	=	pound
in	=	inches
max	=	maximum
m ²	=	square meter
min	=	minute
mm	=	million
MMbtu	=	million Btu
MMcf	=	million cubic feet
ppmv	=	parts per million, by volume
ppmw	=	parts per million, by weight
psia	=	pounds per square inch, absolute
psig	=	pounds per square inch, gauge
scfm	=	standard cubic feet per minute
yr	=	year